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August 10, 1992

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Subject: PR Docket 92-154, Novice Testing under the VEC Program

This letter is being filed to voice my opposition to the referenced docket to bring the Novice testing system under the VEC system. This NPRM is not in the public interest, but only in the interest of cutting costs of the FCC and providing additional monies for the larger VEC programs. The issues pointed out by the ARRL and the W5YI will be refuted as follows:

a) The Codeless Technician is the license of choice and since the Novice License is insignificant in numbers it should be brought into the VEC Program. This statement is true when examined numbers wise, but not necessarily the case age wise. We are supposed to be encouraging young people to join the ranks. A VEC testing session can be a frightening thing to a youngster. The personal attention that can be given to a young person in an individual testing session is by far a better situation and will not scare the individual off. The amount of time it takes to go through most VEC sessions and lack of attention to individual needs is really a turn-off to a young person. Sure VEC's could provide a lot of special sessions for them, but public announcements and other red tape will reduce the people willing to give the tests. In addition, the requirement of three examiners makes the situation even more difficult.

b) The VEC Program reduces the application error rate at the FCC office. This statement is true, but what is the *real* reason. The major problem with error rate is the poor design of the Form 610 for non-VEC testing. I wouldn't be surprised that the FCC Commissioners could not properly fill it out for either a VEC or a non-VEC session without assistance. No wonder there is an error rate. I takes thick manual for W5YI just to explain how to do it for the VEC's. There is a simple solution to this problem, a new form especially for non-VEC testing. I have included one possibility with this letter. It is denoted by the Form number of 610N.

c) The VEC Program is perceived as being more credible. This may be the indication by the FCC, but I don't believe this is necessarily the case by the general populace. My immediate reaction is to remember the two instances of large scale problems with the VEC program in Puerto Rico and California. I vaguely remember reading of some problems outside of the VEC program, but I can't point to a single instance without some research. The point here is that fraud can exist anywhere. It is less significant at the novice level because of the reduced privileges and will require attendance at a VEC program to upgrade. Further, the Novice program would be better served to go back to a 2 year nonrenewable license.

d) The VEC Program is superior. The only comparison the VEC program can make is to that of the FCC giving tests. It is superior. It has provided more testing opportunities for all and done a reasonably good job. It has not proved superior to giving the fully volunteer license. In fact the paperwork for the volunteer examiners will increase, collecting fees and justifying them causes additional hassle that many Hams that have previously done testing won't put up with.

e) The application process is simplified. For who? Not for those giving the exams. The only beneficiary here is the FCC. More hassle for the applicant in finding a VEC session. More hassle

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for the examiners with more paperwork, more hassle for instructors and school teachers in arranging to find accredited VEC's to do the testing. I'm not really sure the FCC is really saved much hassle if the Form 610N is used. Certainly the response time is increased by using the VEC system since the test has to be sent to the VEC before the FCC which will add at least a week to the license process.

(f) Testing is not done properly. This is probably the most valid argument I could see, but I'm not sure anyone has data to prove this point one way or the other. But, the back side of the Form 610N could be used for proper instructions on how to give the test i.e. using the proper number of questions and using all the proper characters for the code test.

(g) The VEC keeps better records. I have given numerous Novice exams and I have never had a problem with keeping a copy of the exam for a year. The FCC has never ask for them, but I still keep them. I also keep a copy of the Form 610 before sending it in. Once again the back of the Form 610N can point out this requirement.

(h) Three examiners are better than two. If someone is going to cheat, they will go to the effort of finding three examiners to do it for them. If someone honestly wants to take the test finding three examiners is a hassle. Two is plenty I was never opposed to one examiner which served us well for a lot more years than there have been VEC's.

In summary, most of the problems that can be attributed to the non-VEC examinations can be solved with paperwork simplification on the part of the FCC. The program will continue to have more opportunities for young people to take tests, a larger number of examiners, and less hassle than a VEC session. In addition, the test will still remain free with a shorter turnaround time. If the Form 610 is simplified, the FCC's error problem will not be an issue. *As a result, this rule is clearly not in the public interest.*

Yours truly,

A handwritten signature in black ink, appearing to read "Ronald C. Earl", written in a cursive style.

Ronald C. Earl, W6TXK

FEDERAL COMMUNICATIONS COMMISSION
GETTYSBURG, PA 17326

**APPLICATION FOR AN AMATEUR RADIO NOVICE CLASS STATION
AND/OR OPERATOR LICENSE**

Administering VE's Report

All questions must be answered. If credit for elements is given, each examiner is to initial half of the square.

Both Examiners Initial

5 WPM CODE
ELEMENT 1A

NOVICE THEORY
ELEMENT 2

A. Does the applicant have a Certificate of Successful Completion or 610N from prior test session held less than 1 year from today? NO ☐, YES ☐
If yes, date given mm/dd/yy ____/____/____

B. Does the applicant hold an FCC Commercial Radio-telegraph Operator License? NO ☐, YES ☐
If yes, number _____ and expiration date mm/dd/yy ____/____/____

C. Examination Elements that were passed today ☐
mm/yy/dd ____/____/____ (Today's Date)

D. Applicant is qualified for a Novice License:

Yes ☐

No ☐

If the answer to this question is NO, this form may be used by the applicant for 1 year as proof of successful completion of Element 1A or 2.

SECTION I (APPLICANT TO COMPLETE)

1. CURRENT FIRST NAME	M.I.	LAST NAME	SUFFIX (Jr., Sr., etc.)	2. DATE OF BIRTH ____/____/____ MM/DD/YY
3. CURRENT MAILING ADDRESS (Number and Street)			CITY	STATE ZIP CODE
4. PROPOSED STATION LOCATION (MUST BE A LOCATION. No P.O. Box, RFD or General Delivery)				

5. Would a Commission grant of your application be an action which may have a significant environmental effect as defined by Section 1.1307 of the Commission's Rules? If you answer Yes, submit the statement as required by Sections 1.1308 and 1.1311.

☐ Yes ☐ NO

I CERTIFY THAT all statements herein and attachments herewith are true, complete, and correct to the best of my knowledge and belief and are made in good faith; that I am not a representative of a foreign government; that I waive any claim to the use of any particular frequency regardless of prior use by license or otherwise; and that the station to be licensed will be inaccessible to unauthorized persons.

WILLFUL OR FALSE STATEMENTS MADE ON THIS FORM OR ATTACHMENTS ARE PUNISHABLE BY FINE AND IMPRISONMENT
U.S. CODE TITLE 18, SECTION 1001

6. SIGNATURE OF APPLICANT: (Must match Item 1)

7. DATE SIGNED
____/____/____ MM/DD/YY

SECTION II (EXAMINERS TO COMPLETE)

I CERTIFY THAT I have complied with the Administering VE requirements stated in Part 97 of the Commission's Rules; THAT I have administered to the applicant and graded an amateur radio operator examination in accordance with Part 97 of the Commission's Rules; THAT I have indicated in the Administering VE's Report the examination element(s) the applicant passed; THAT I have examined documents held by the applicant and I have indicated in the Administering VE's Report the examination element for which the applicant is given examination credit in accordance with Part 97 of the Commission's Rules.

Examiner 1		Examiner 2	
1A. VOLUNTEER EXAMINER'S NAME: (First, MI, Last Suffix) (Print or Type)		2A. VOLUNTEER EXAMINER'S NAME: (First, MI, Last Suffix) (Print or Type)	
1B. VE'S MAILING ADDRESS: (Number, Street, City, State, Zip Code)		2B. VE'S MAILING ADDRESS: (Number, Street, City, State, Zip Code)	
1C. VE'S OPERATOR CLASS: <input type="checkbox"/> GENERAL <input type="checkbox"/> ADVANCED <input type="checkbox"/> EXTRA	1D. VE'S CALL SIGN:	2C. VE'S OPERATOR CLASS: <input type="checkbox"/> GENERAL <input type="checkbox"/> ADVANCED <input type="checkbox"/> EXTRA	2D. VE'S CALL SIGN:
1E. LICENSE EXPIRATION DATE: ____/____/____ MM / DD / YY	1F. IF YOU HAVE AN APPLICATION PENDING FOR YOUR LICENSE GIVE FILING DATE: ____/____/____ MM / DD / YY	2E. LICENSE EXPIRATION DATE: ____/____/____ MM / DD / YY	2F. IF YOU HAVE AN APPLICATION PENDING FOR YOUR LICENSE GIVE FILING DATE: ____/____/____ MM / DD / YY
1G. SIGNATURE (Must match 1A)	DATE SIGNED ____/____/____ MM / DD / YY	2G. SIGNATURE (Must match 2A)	DATE SIGNED ____/____/____ MM / DD / YY